Department of Energy
Ohio Field Office
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

DW:2002:0540

November 6, 2002

Mr. James L. Little, President
West Valley Nuclear Services Company
10282 Rock Springs Road
West Valley, NY 14171-9799

ATTENTION: W. M. Wierzbicki, Environmental Affairs Manager, WV-50

SUBJECT: Environmental Checklist OH-WVDP-2002-01, Decontamination Activities for the Main Plant Building

REFERENCE: Letter WD:2002:0553 (84913), W. M. Wierzbicki to A. C. Williams, "Environmental Checklist OH-WVDP-2002-01, 'Decontamination Activities for the Main Plant Building,'" dated October 15, 2002

Dear Sir:

The Ohio Field Office West Valley Demonstration Project National Environmental Policy Act (NEPA) Compliance Officer has reviewed the subject environmental checklist and determined that the action described therein is categorically excluded from the requirement to prepare additional NEPA documentation in the form of either an environmental assessment or environmental impact statement. Enclosed is a signed Environmental Checklist with attachment.

If you have any questions, you may contact me on Extension 4016.

Sincerely,

Daniel W. Sullivan, Jr.
NEPA Compliance Officer

Enclosure: Environmental Checklist with attachment

cc: H. R. Moore, OH/WVDP, WV-DOE, w/enc.

DWS:0144 - 84958 - 451.7

DWS/brb

Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

Project/Activity Title: Decontamination Activities for Main Plant Building	**NEPA ID Number** OH-WVDP-2002-01 **Rev. #:** 0 **Date:** 10/10/2002
Contractor Project Manager: S. A.MacVean	**Phone Number:** (716) 942-4328
Contractor NEPA Coordinator: J. J. Hoch	**Phone Number:** (716) 942-2409
OH/WVDP NEPA Document Manager: D. W. Sullivan	**Phone Number:** (716) 942-4016

A. BRIEF PROJECT/ACTIVITY DESCRIPTION: Attach a detailed description or statement of work.

B. SOURCES OF IMPACT: Would the action involve, generate, or result in changes to any of the following?

	YES	NO		YES	NO
1. Air Emissions	X		12. Water Use/Diversion	X	
2. Liquid Effluents	X		13. Water Treatment	X	
3. Solid Waste	X		14. Water Course Modification		X
4. Radioactive Waste/Soil	X		15. Radiation/Toxic Chemical Exposures	X	
5. Hazardous Waste	X		16. Pesticide/Herbicide Use		X
6. Mixed Waste	X		17. High Energy Source/Explosives		X
7. Chemical Storage/Use	X		18. Transportation	X	
8. Petroleum Storage/Use		X	19. Noise Level		X
9. Asbestos	X		20. Workforce Adjustment		X
10. Utilities	X		21. Other		X
11. Clearing or Excavation		X			

In an attachment, qualify and explain each question that you have specifically answered "YES."

C. CATEGORY EVALUATION CRITERIA: Would the proposed action:

	YES	NO
1. Take place in an area of previous or ongoing disturbance?	X	
2. Create hazardous, radioactive or mixed waste for which no disposal is available?	X	
3. Impact a RCRA-regulated unit or facility?	X	
4. Force a low income or ethnic minority population to shoulder a disproportionate share of the negative environmental impacts of pollution or environmental hazards because of a lack of political or economic strength?		X
5. Involve air emissions and be located in an air pollutant non-attainment or maintenance area for any criteria pollutants?		X
6. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive Orders? (i.e., require any federal, state or local permits, approvals, etc.)?		X
7. Disturb hazardous substances, pollutants or contaminants that pre-exist in the environment such that there would be uncontrolled or unpermitted releases?		X
8. Require siting, construction, or major expansion of a waste storage, disposal, recovery, or treatment facilities, but may include such categorically-excluded facilities?		X
9. Adversely affect environmentally sensitive resources including, but not limited to: structures of archeological, historic or architectural significance; threatened or endangered species or their habitat; floodplains or wetlands; wildlife refuges, agricultural lands or vital water resources(e.g., sole-source aquifers)?		X
10. Involve extraordinary circumstances? As specified at 10 CFR § 1021.410(b)(2), extraordinary circumstances are unique situations presented by specific proposed actions, such as scientific controversy about the environmental effects of the action, uncertain effects or effects involving unique or unknown risks, or unresolved conflicts concerning alternate uses of available resources within the meaning of Section 102(2)(E) of NEPA [42 U.S.C. 4332(2)].		X
11. Be "connected" to other actions with potentially significant impacts, related to other proposed actions with cumulatively significant impacts, and precluded by 40 CFR § 1506.1 or 10 CFR § 1021.211?		X

In an attachment, qualify and explain each question that you have specifically answered "YES."

U.S. Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

D. RECOMMENDATION AND DETERMINATION

DOE OH/WVDP Director's Recommendation: I find and recommend that this proposed action meets the criteria specified in 10 CFR § 1021, Subpart D, and/or DOE Policy and Guidance for the following:

[X] Categorical Exclusions (Appendix B, Class of Action B1.28)
[ ] Actions Within the Scope of Existing NEPA Documentation
(NEPA Document ID Number _____)
[ ] *On-going Operations* (Standard Operating Procedure OH-6.1.01, Rev. 1, Section 5.2)

Signature: Alice C Williams Date 10/31/02
Director, Ohio Field Office,
West Valley Demonstration Project (OH/WVDP),
Department of Energy

DOE OH/WVDP NEPA Compliance Officer's Determination: Based on my review of the attached information concerning this proposed action, as the OH/WVDP NEPA Compliance Officer (DOE Order 451.1A, Section 5.d.), I have determined that the proposed action fits within the specified class of actions, that the other regulatory requirements identified in Section C are met, and that this proposed action proceed without further NEPA review.

Signature: Daniel W. Sullivan Date 10/18/2002
OH/WVDP NEPA Compliance Officer,
West Valley Demonstration Project

OR

[ ] Environmental Assessments (Appendix C, Class of Action _____; or Action not listed in Subpart D)
[ ] Environmental Impact Statements (Appendix D, Class of Action _____)
[ ] Interim Actions (40 CFR § 1506.1 and 10 CFR § 1021.211)
[ ] Integrated Documentation for CERCLA/RCRA Actions
[ ] Variances (Emergency Action, 40 CFR § 1506.11 and 10 CFR § 1021.34)

DOE-OH NEPA Compliance Officer's Concurrence: I concur with the recommendation that this proposed action fits within the specified class of actions.

Signature: _____ Date _____
NEPA Compliance Officer,
Ohio Field Office,
Department of Energy

DOE-OH Manager's Determination: Based on my review of the attached information concerning this proposed action, as the Head of the Ohio Field Office (DOE Order 451.1A, Section 5.a.), I have determined that the level of documentation recommended for the proposed action is appropriate.

Signature: _____ Date _____
Manager, Ohio Field Office,
Department of Energy

Attachment to Environmental Checklist OH-WVDP-2002-01
Decontamination Activities for the Main Plant Building

SECTION A. PROJECT/ACTIVITY DESCRIPTION

1.0 BACKGROUND

The West Valley Demonstration Project (WVDP) Act [Public Law 96-368] (the "Act") authorized the United States Department of Energy (DOE) to carry out a high-level liquid nuclear waste management demonstration project at the Western New York Nuclear Service Center (WNYNSC) in West Valley, New York. The Act, among other things, requires DOE to develop a waste form to solidify high-level waste (HLW) that is suitable for transportation and disposal. It also requires the DOE to decontaminate and decommission (D & D) tanks and other facilities at the WNYNSC in which HLW was stored, as well as all WVDP facilities, material, and hardware used in supporting and carrying out the Act.

The Main Plant Building (former Nuclear Fuel Services (NFS) Processing Building) was designed to recover uranium and plutonium from spent nuclear fuel from 1966 to 1971 during the NFS reprocessing operations. The physical and chemical reprocessing operations were conducted in specially designed cells, rooms, aisles, and glove boxes. Some decontamination work was done in the Main Plant Building during the 1970s as part of planned maintenance, modification, or expansion. From 1982 to 1987, the WVDP performed decontamination operations in several cells and rooms to prepare them for use as HLW interim storage or as part of the Liquid Waste Treatment System (LWTS).

The NEPA analysis for the prior decontamination activities conducted in the Main Plant Building was documented by the *Final Environmental Impact Statement for the Long Term-Management of Liquid High-Level Radioactive Wastes Stored at the Western New York Nuclear Service Center, West Valley* (DOE/EIS-0081, i.e.," the 1982 EIS"). The 1982 EIS also provided that "eventually all the facilities used for the solidification project would be decontaminated and dismantled–including the main building used in the solidification process..."(DOE/EIS-0081, section 2.1, pg 2-6). The 1982 EIS further assumed that most of the decontamination effort would occur in two periods: a) the initial period to decontaminate facilities used for the solidification and temporary storage operations; and b) the final decontamination and decommissioning of the facilities used.

Final plant decommissioning, as well as decommissioning of other Project and non-Project facilities, was the subject of Draft Environmental Impact Statement (DEIS) (DOE/EIS-0226-D) begun in 1989 and issued for public comment in 1996. DOE has since rescoped that DEIS, and separated the waste management decisions from the decommissioning decisions. The waste management decisions are now being evaluated in a second separate waste management environmental impact statement. The waste management draft EIS is scheduled to be issued for public review and comment during the first quarter Fiscal Year 2003. Final plant decommissioning continues to be analyzed under NEPA in what is now titled the West Valley Decommissioning and/or Long-Term Stewardship EIS (DOE/EIS-0226-R), which is a continuation of the EIS begun in 1989.

LIST OF ACRONYMS

ALARA	As Low As Reasonably Achievable
ARC	Acid Recovery Cell
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CAS	Central Alarm Station
CFR	Code of Federal Regulations
CX	Categorical Exclusion
D&D	Decontamination and Decommissioning
DEIS	Draft Environmental Impact Statement
DOE	Department of Energy
DOT	Department of Transportation
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
GTCC	Greater Than Class C
HEPA	High Efficiency Particulate (Filter)
HLW	High-Level Waste
LLW	Low-Level Waste
LLWTF	Low-Level Waste Treatment Facility
LLW2	Low-Level Waste Treatment Facility (new)
LWTS	Liquid Waste Treatment Facility
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFS	Nuclear Fuel Services
NYCRR	New York Code of Rules and Regulations
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOL	New York State Department of Labor
PVU	Portable Ventilation Unit
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SOP	Standard Operating Procedure
SPDES	State Pollutant Discharge Elimination System
SWMU	Solid Waste Management Unit
TRU	Transuranic Waste
WIPP	Waste Isolation Pilot Plant
WNYNSC	Western New York Nuclear Services Center
WVDP	West Valley Demonstration Project
WVNSCO	West Valley Nuclear Services Company

In preparing a revised draft EIS to support decommissioning decisions, the WVDP has initiated a series of facility characterization efforts, one of which is being conducted in the Main Plant Process Building. Because of the degree of uncertainty regarding the physical and radiological conditions within many of the cells and rooms in the Main Plant, the characterization effort will systematically evaluate historical information and, where deemed necessary, will collect and analyze physical samples to better ascertain physical and radiological conditions within these cells and rooms. It is anticipated that, in the course of this characterization effort, some decontamination activities will be recommended to de-energize systems (i.e., drain and remove piping and/or vessels), remove surface contamination, remove hardware containing radioactive materials, or to take other appropriate decontamination activities. These efforts are designed to reduce health, safety, and environmental risks, pending a final decision on the ultimate WVDP decommissioning endstate alternatives which will be evaluated in the Decommissioning and/or Long-Term Stewardship EIS.

2.0 TYPE AND SCOPE OF ACTIVITY

Scopes of Work

The proposed action evaluated in this checklist is the decontamination of rooms, cells and areas in the Main Plant Process Building. This checklist has incorporated the full suite of cells, rooms, and areas being currently evaluated under the characterization effort (NEPA Checklist #OH-WVDP-94-15) to ensure that all potential activities that may be proposed in this action are adequately considered. However, it is likely that only a small number of the cells, rooms, or areas being evaluated in the characterization effort will be proposed for additional decontamination. In addition to actual decontamination, associated supporting activities would include waste characterization and associated waste management activities (e.g. size reduction, packaging, etc).

Primary cells/ rooms, and other areas of the Main Plant Building are identified in Attachment A; additional rooms/cells may also be considered for decontamination.

Some cells/rooms are expected to be highly contaminated. Initial decontamination may include the use of an encapsulent sprayed to fix any remaining loose contamination. Equipment would be dismantled and the pieces size-reduced to fit into designated radioactive waste containers. Also, debris would also be placed into waste containers. Work scopes may include the abatement and removal of any suspect asbestos, where appropriate, in and around designated rooms or cells and equipment.

At a minimum, decontamination methods to be used may include all of the technologies identified in DOE/EM-0142P Decommissioning Handbook, March, 1994, Section 9.0, "Decontamination" and/or new technologies as they become available. Different methods for decontamination would be used, such as chemical, mechanical or manual, depending on the specific task to be performed. For example, chemical decontamination may be used for flushing of tanks and piping systems. Mechanical processes such as vacuuming, washing, swabbing, foaming agents, application of peelable coatings, wet/dry abrasive cleaning and grinding of surfaces could be used to remove fixed and/or loose contamination.

Dismantlement methods to be used may include all of the technologies identified in DOE/EM-0142P Decommissioning Handbook, March, 1994, Section 10, "Dismantling, Segmenting, and Demolition" and/or new technologies as they become available. Dismantling/Segmenting techniques are grouped into three categories: mechanical, thermal, and other. Any of the methods listed below, may be used:

Mechanical	Thermal	Other
- nibblers and shears - mechanical saws - circular saws - abrasive saws - wall and floor saws - diamond wire - core/stitch drilling	- plasma arc - oxygen burning - flame cutting - thermal reaction lance - arc saw	- abrasive jet (e.g. water, only; water with grit-like materials such as sand)

Tools such as electric reciprocating saws, portable bandsaws, pipe cutters, and hydraulic shears would be the most preferable because they are lightweight, swift and efficient in operation.

3.0 PURPOSE AND NEED

The **purpose** of this proposed action is to perform additional decontamination activities within the Main Plant, where deemed appropriate, to de-energize systems (i.e., drain and remove piping and/or vessels), remove surface contamination, remove hardware containing radioactive materials, or to undertake other decontamination activities designed to place cells, rooms, and/or areas in an environmentally safe condition where there is no proposed use for those cells, rooms, and/or areas.

The **need** is for DOE to continue to fulfill its obligations under the WVDP Act to manage and mitigate health, safety, and environmental risks associated with the WVDP, pending decisionmaking on final Project decommissioning.

4.0 SCHEDULE AND TIMING

Decontamination activities covered by this CX are projected to begin in October 2002.

SECTION B: SOURCES OF IMPACT

1. **Air Emissions:** The control of loose activity from becoming airborne and the control and reduction of dose to the workers will be key in working in the proposed plant areas. Negative air pressure on the rooms, cells, areas, is drawn by the Main Plant and Head End Vent systems. If additional air flow is needed a HEPA filtration or other ventilation system may be incorporated into the operation. Containment enclosures used could be ventilated with one of the site's portable ventilation units (PVUs). Tents would be ventilated using one

of the permitted portable ventilation units (PVUs) (NESHAP Permit # WVDP-587-01). The PVU would be operated in accordance with EMP-300, "Routine WVDP Stack Air Effluent Monitoring and Sampling."[1]

Radio nuclide emissions would be ventilated through the Main Process Building and Head End Ventilation Systems. Supplemental ventilation systems may be considered and/or modified to facilitate operational needs such as the Temporary Ventilation System. Any potential radionuclide emissions for these decontamination operations would be evaluated in accordance with 40 CFR Part 61, Subpart H. With respect to stack monitoring, a pre-operational evaluation of the proposed decontamination work for each area would be performed to determine the types and quantities of radioactive airborne emissions expected from the facility as specified in DOE/EH-0173T, "Environmental Regulatory Guide for Radiological Effluent Monitoring and Environmental Surveillance."

Additionally, torch or plasma arc cutting may be used resulting in emissions which will be reviewed by Environmental Affairs to ensure compliance with the WVDP's New York State Facility Air Permit. If chemical flushes of piping and tanks occur, the resulting air emissions would also be reviewed by Environmental Affairs.

2. **Liquid Effluents:** Water could be used to decontaminate the surfaces. It is estimated that approximately 1 gallon of contaminated waste water would be generated for every 10 ft^2 of surface area decontaminated. Cooling wastewater used to cool mechanical equipment may also be generated. Less than 0.2 million gallons per year of process and cooling wastewater would be generated. The wastewater would be characterized in accordance with on-site procedures. Waste waters deemed acceptable would be transferred to the interceptor for processing through the Low Level Waste Treatment Facility (LLWTF). Chemicals could also be added to the water to facilitate decontamination (See below, Section B #7, Chemical Use/Storage). Higher activity Waste waters will be directed to the Liquid Waste Treatment System (LWTS) evaporator for pretreatment prior to disposition to the LLWTF.

3. **Solid Waste:** Solid (non radioactive) wastes would be generated primarily from, but not necessarily be limited to, the manufacture and use of mock-ups utilized in the development of work activities to maintain ALARA principles.

4. **Radioactive Waste:** Given the locations and nature of the proposed action, radioactive waste is expected to be generated. LLW, GTCC, and TRU could be generated from decontamination and/or dismantlement of piping, valves, equipment, vessels, pumps, racks, condensers, glove boxes, and other debris. Since many areas are sealed rooms and entry has not been made since reprocessing operations ceased in the 1970's, actual quantities can not be accurately estimated. Additional radioactive waste generated would include asbestos insulation/debris, anti-C's, gloves, wipes, swipes, air filters, and equipment and tooling utilized. Radioactive waste generated as a result of the proposed decontamination activities would be packaged and stored in accordance with on-site procedures.

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[1] All procedures identified henceforth in this checklist refer to the most recent revisions; procedures reference in this document are applicable at the time of approval; equivalent procedures may be developed or modified for future operations described herein.

5. **Hazardous Waste:** The potential exists that hazardous waste could be generated from the use of equipment (e.g., batteries) used in size reduction, decontamination techniques, etc. Any hazardous waste generated would be handled according to regulatory requirements and on-site procedures.

6. **Mixed Waste:** The potential exists that residual chemical wastes could be contained in the contaminated tanks, piping, drains, and systems. These wastes include, but are not limited to: metals, acid residues, caustics, perchloric acid residues, uranyl nitrate, etc. Chemically contaminated components would be characterized and dispositioned according to on-site procedures. Mixed low level radioactive waste would be characterized and stored in accordance with on-site procedures. Any mixed waste generated that could not meet the Land Disposal Restriction Requirements identified in the Resource Conservation and Recovery Act, would be addressed under the requirements of the Federal Facility Compliance Act according to the WVDP FFCAct Site Treatment Plan (WVDP-299).

7. **Chemical Use/Storage:** Water may be used in the decontamination methods. Chemicals could be added to the water to facilitate decontamination. Additionally, fixatives could be applied to stabilize loose contamination. Chemicals used that would impact Clean Water Act permitted systems or discharges would be as specified and approved by the NYSDEC in accordance with State Pollutant Discharge Elimination System (SPDES) permit (NY-0000973) and the SPDES program regulations.

8. **Petroleum Storage/Use:** N/A

9. **Asbestos:** Asbestos is suspected to exist in but may not be limited to: glove boxes, insulation and valve packings, piping, pump nitches, and gaskets. If necessary, asbestos would be abated in accordance with 12 NYCRR Part 56, "Asbestos," as amended November 9, 1994, and approved site specific variances; 29 CFR 1926.1101, "Asbestos;" 40 CFR 61, Subparts A & M, "National Emission Standards for Hazardous Air Pollutants".

   Additionally, WVNSCO holds a New York State Department of Labor (NYSDOL) Asbestos Contractors license for asbestos activities performed by WVNSCO personnel. All WVNSCO personnel who perform asbestos related activities must hold current NYS Department of Health certified training for the specific class of work to be completed. This training requires an annual refresher. All asbestos workers and engineers must also have a valid NYSDOL asbestos handlers certification.

10. **Utilities:** Prior to dismantling or segmenting any components, utilities to the component (e.g., sources of water, electric power, steam) may be disconnected to ensure the safety of personnel involved. Electrical and instrumentation components, process and piping utilities and piping will be cut, isolated and/or removed where present. Ventilation systems would remain intact until final decommissioning decisions are made after completion of the Decommissioning and/or Long-Term Stewardship EIS.

11. **Clearing of Excavation:** N/A

12. **Water Use/Diversion:** Water may be used to decontaminate the surfaces. Approximately 1 gallon of water/wash solution may be used for every 10 ft^2 of surface area decontaminated (AIF/NESP-036). Additionally, process cooling wastewater may be used in the operation of saws and other cutting equipment.

13. **Water Treatment:** Decontamination solutions would be collected in collection tanks and sampled. Based on the sampling results, wastewaters would be treated using existing site treatment systems (e.g., the Liquid Waste Treatment System or Low-Level Waste Treatment Facility). Wastewater would be disposed in accordance with NYSDEC SPDES permit requirements.

14. **Water Course Modification:** N/A

15. **Radiation/Toxic Chemical Exposures:** Individual exposures would depend on the duration of decontamination operations and the proximity to and handling of equipment, tank, piping, etc. Respiratory and skin contamination prevention will be planned for areas high in alpha contamination. Rooms and cells having higher dose exposures would utilize the practices of ALARA and follow applicable State and Federal regulations and DOE Orders as implemented by WVDP-010, "Radiological Controls Manual," WVDP-011, "Industrial Hygiene and Safety Manual," SOP 15-14, "Entry Into and Exit From Contaminated Areas," and SOP 00-43, "Personnel Access to High and Very High Radiation Areas." The individual worker's exposure would not exceed the administrative control limits of the WVDP Radiological Controls Manual.

16. **Pesticide/Herbicide Use:** N/A

17. **High Energy Source/Explosive:** N/A

18. **Transportation:** Radiation levels for all repackaged waste will be within applicable DOT limits (49 CFR Parts 173 and 177). Waste containers will be transported on-site in accordance with SOP 300-07, "Waste Generation, Packaging and On-site Transportation." Before any radioactive waste container could be transported off-site, it will meet the packaging requirements for radioactive materials set forth in 49 CFR Part 173, "Subpart I - Radioactive Materials," and 10 CFR Part 71, "Packaging and Transport of Radioactive Material."

    Additionally hazardous and mixed waste shipments will meet the manifesting requirements set forth in 40 CFR part 262, "Standards Applicable to Generators of Hazardous Waste" (and 6 NYCRR 372, "Hazardous Waste Manifest System and Related Standards for Generators, Transporters and Facilities." All waste shipments would be in accordance with the requirements for shipments specified in 49 CFR Part 100 - 177, "Transportation," and 6 NYCRR Part 381, "Transporters of Low-Level Radioactive Waste."

19. **Noise Level:** N/A

20. **Workforce Adjustment:** N/A

21. **Other:** N/A

SECTION C CATEGORY EVALUATION CRITERIA

1. **Take place in an area of previous or on-going disturbance?**

The proposed action would take place in a facility of previous disturbance. Certain areas of the Main Plant Building underwent some prior decontamination effort in the 1980's. Some decontamination work has been on-going under other existing NEPA Documentation such as PPH Glovebox, Acid Recovery Pump Room and the Head End Cells.

2. **Create hazardous, radioactive, or mixed waste for which no disposal is available?**

Class B, C and TRU waste could be generated. Federal disposal capacity is available for TRU waste at DOE's Waste Isolation Pilot Plant (WIPP). At this time, however, the WIPP Land Withdrawal Act specifies that only TRU waste generated by defense activities may be disposed of at WIPP, which has been interpreted to preclude any WVDP TRU waste disposal at WIPP. However, the WVDP Waste Management EIS is evaluating the transportation of TRU waste to WIPP, should WIPP become available to the WVDP in the future.

Class B, and C waste could be disposed of at the DOE Nevada Test Site or Hanford following issuance of a Record of Decision on the WVDP Waste Management EIS, if that ROD so specifies. This is expected to be DOE's preferred alternative in the Waste Management DEIS.

Mixed wastes for which there are no treatment or disposal is available would be managed according to the "WVDP FFCAct Site Treatment Plan," (WVDP-299) as previously noted in Section B, 6.

3. **Impact a RCRA regulated unit or facility?**

The WVDP Resource Conservation Recovery Act (RCRA) Facility Investigation (RFI) report was developed to meet the RCRA 3008 (h) Administrative Order-on-Consent requirements. It identified rooms and cells of the Main Process Plant as Solid Waste Management Units (SWMUs). If these rooms contain radioactive mixed wastes, they would be handled in accordance with the provisions of the Consent Order and RCRA requirements.

4. **Force a low income or ethnic minority population to shoulder a disproportionate share of negative environmental impacts, etc.?**

No. Environmental justice considerations conclude that proposed action will not have a negative bearing on ethnic or minority groups within the WVDP area.

5. **Involve air emissions and be located in an air-pollutant non-attainment or maintenance area, etc.?**

No. The WVDP is not located in a non-attainment area.

6. **Require any federal, state or local permits, approvals, notifications, etc.**

The proposed decontamination activities will not threaten a violation of applicable statutory, regulatory, or permit requirements. Any permits or notifications that could be required are discussed below.

a) NESHAPS - Radioactive emissions are regulated in New York State by the U.S. Environmental Protection Agency (EPA) pursuant to 40 CFR 61, "National Emission Standards for Hazardous Air Pollutants" (NESHAP), Subpart H. Subpart H requires facilities to evaluate the potential radionuclide emissions to air from any proposed activity to determine NESHAP permit and stack monitoring requirements. Accordingly, NESHAP permit requirements would be determined for the proposed decontamination work. A dose and risk assessment would be performed for these activities using CAP88-PC (Clean Air Assessment Package - 1988) to determine NESHAP permit and stack monitoring requirements.

b) SPDES - The most recent SPDES permit application, filed in September 2000, identified decontamination wastewater, including spent demineralized water and/or nitric acid solution, as a source to outfall 001 (i.e., LLWTF-Lagoon 3) at an average flow rate of 0.7 +/- 0.4 million gallons per year (MGY). Cooling wastewater is also identified on the most recently filed SPDES permit application at outfall 001 at an average rate of 0.1 +/- 0.05 MGY.

A SPDES permit application and NYSDEC approval for the use of any water treatment chemicals, which are not already approved or listed on the most current WVDP SPDES permit, may also be necessary. The resultant SPDES Permit with modified terms and conditions became effective July 15, 2002.

c) RCRA -The New York State Department of Environmental Conservation (NYSDEC) requested (Letter, DW:2000:132, dated February 16, 2000) that DOE provide NYSDEC a status report on any future investigations of the sealed rooms. As such, status reports and/or updates for the sealed rooms would be provided to NYSDEC.

d) Asbestos Notifications -WVNSCO must submit asbestos project notifications to EPA NESHAPS and NYSDOL when the amount of asbestos to be removed is greater than 260 linear feet or 160 square feet. Notifications must be submitted at least 10 working days prior to the start of the project. If delay of the project occurs after the submittals of the

notifications are made, amended notifications with the new start date must be submitted prior to the original start date. The final air monitoring clearance results must also submitted to NYSDOL.

7. **Disturb hazardous substances, pollutants or contaminants that pre-exist in the environment, such that there would be uncontrolled or unpermitted releases?** No.

8. **Require siting, construction, or major expansion of a waste storage, disposal, recovery, or treatment facilities, etc.?** No

9. **Adversely affect environmentally sensitive resources, etc.?**

   No. See discussion, Section D.

10. **Involve extraordinary circumstances?** No.

11. **Be "connected" to other actions with potential significant impacts, etc.**

    No. See discussion, Section D.

SECTION D RECOMMENDATION AND APPROVAL

A Categorical Exclusion (CX) is recommended for the proposed action. A CX should be granted on the basis that the proposed action is within the scope of Title 10, Code of Federal Regulations (CFR) 1021, as amended, Subpart D, Appendix B, B 1.28, "Minor activities required to place a facility in an environmentally safe condition where there is no proposed use for the facility. These activities would include but not limited to, reducing surface contamination, and removing materials, equipment or waste, such as final defueling of a reactor, where there are adequate facilities for the treatment, storage, or disposal of the materials, equipment, or wastes. These activities would not include conditioning, treatment, or processing of spent nuclear fuel, high-level waste, or special nuclear materials."

The proposed action clearly falls within the scope and intent of the categorical exclusion identified above. In addition, the proposed action satisfies the general requirements for a categorical exclusion. There are no extraordinary circumstances related to the proposed action that would affect the significance of the action, and the action is not "connected" to other actions with potentially or cumulatively significant impacts (40 CFR 1508.25(a)(1) and (2), respectively.

Moreover, the proposed action meets the eligibility criteria for application of categorical exclusion B 6.1 in that the action would not: 1) threaten a violation of applicable statutory, regulatory or permits requirements for environmental, safety, and health, including all requirements from DOE Orders; 2) require siting and construction or major action of waste storage, disposal, recovery, or treatment facilities; 3) adversely affect environmentally sensitive resources; and; 4) disturb hazardous substances, pollutants, contaminants or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases.

SUPPORTING DOCUMENTATION

AIF/NESP-036	T.S. LaGuardia et al. TLG Engineering, Inc., for the Atomic Industrial Forum, "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," dated 1986
CAP88-PC	U. S. Department of Energy, "Clean Air Assessment Package," dated June 1997
10 CFR Part 71	U. S. Department of Energy, "Packaging and Transport of Radioactive Material," dated January 13, 1998
10 CFR 1021	U. S. Department of Energy, "National Environmental Policy Act Implementing Procedures; Final Rule," dated July 9, 1996
29 CFR 1926.1101	U. S. Occupational Safely and Health Administration, "Toxic and Hazardous Substances," Subpart Z, dated June 29, 1995
40 CFR 61	U. S. Environmental Protection Agency, "National Emission Standards for Hazardous Air Pollutants" (NESHAP), Subparts A, H, and M," dated July 1, 1998
40 CFR 262	U. S. Environmental Protection Agency, "Standards Applicable to Generators of Hazardous Wastes," Subpart B, dated July 1, 1998
40 CFR 1500 - 1508	U.S. Council on Environmental Quality, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act," dated July 1, 1996
49 CFR 100 - 177	U. S. Department of Transportation, "Transportation," dated October 1, 1992
DOE/EH-0173T	"Environmental Regulatory Guide for Radiological Effluent Monitoring and Environmental Surveillance."
DOE/EIS-0081	U. S. Department of Energy, "Final Environmental Impact Statement: Long-Term Management of Liquid High-Level Radioactive Wastes Stored at the Western New York Nuclear Services Center, West Valley," dated June 1982
DOE/EIS-0226-D	U.S. Department of Energy,"Completion of the West Valley Demonstration Project and Closure or Long-Term Management of Facilities at the Western New York Nuclear Services Center," dated March 1996

DOE/EM-0142P	U. S. Department of Energy, "Decommissioning Handbook", dated March 1994
DOE Order 435.1	U. S. Department of Energy, "Radioactive Waste Management," dated July 9, 1999
DOE Order 451.1	U.S. Department of Energy, "National Environmental Policy Act Compliance Program," dated September 11, 1995
DW:2000:0132	M. N. Maloney to R. R. Campbell, "January 31, 2000 Meeting - U. S. Department of Energy and New York State Department of Environmental Conservation," dated February 16, 2000
EMP-300	West Valley Demonstration Project, "Routine WVDP Stack Air Effluent Monitoring and Sampling," dated September 15, 1999
63 FR 3625	U. S. Department of Energy, "Record of Decision for the Department of Energy's Waste isolation Pilot Plant Disposal Phase," dated January 23, 1998
NY-0000973	New York State Department of Environmental Conservation, "State Pollutant Discharge Elimination System (SPDES) Discharge Permit for the West Valley Demonstration Project," as modified, dated February 1, 1994
6 NYCRR Parts 370-376	New York State Department of Environmental Conservation, "Chapter IV - Quality Services, Subchapter B - Solid Wastes," dated May 14, 1985
6 NYCRR Part 381	New York State Department of Environmental Conservation, "Transporters of Low-Level Radioactive Waste," dated August 16, 1998
12 NYCRR Part 56	New York State Department of Labor, "Asbestos," as amended November 9, 1994
Public Law 96-368	U. S. Congress, West Valley Demonstration Project (S.2443), dated October 1, 1980
RCRA 3008(h)	U. S. Department of Energy & New York State Energy Research and Development Authority, "Administrative Order of Consent," dated March 1992
SOP 000-43	West Valley Nuclear Services Company, "Personnel Access to High and Very High Radiation Areas" Revision 005 FC2, dated September 10, 2002.

SOP 009-21	West Valley Nuclear Services Company, "Lag Storage Operations," Revision 9, dated June 18, 2002.
SOP 015-14	West Valley Nuclear Services Company, "Entry Into and Exit from Contaminated Areas," Revision 17 FC3, dated July 29, 2002.
SOP 300-06	West Valley Nuclear Services Company, "Hazardous Waste Storage Operations," Revision 8 FC3, dated July 15, 2002.
SOP 300-07	West Valley Nuclear Services Company, "On-Site Waste Generation, Packaging and Transportation," Revision 14 FC2, dated June 8, 2002.
SOP 300-09	West Valley Nuclear Services Company, "Interim Waste Storage Facility Operation," Revision 07 FC1, dated June 12, 2002.
SOP OH-6.1.01	Ohio Field Office, "National Environmental Policy Act Compliance," Revision 1, dated July 7, 1995
WVDP-010	West Valley Demonstration Project, "Radiological Controls Manual," Revision 17, dated May 24, 2002.
WVDP-011,	West Valley Demonstration Project, "Industrial Hygiene and Safety Manual, " Revision 17, dated February 11, 2002
WVDP-072	West Valley Demonstration Project, "Asbestos Management Plan," Revision 5, dated October 26, 1999
WVDP -299	West Valley Demonstration Project, "Site Treatment Plan, Fiscal Year 2001 Update," Revision 4, dated February 2002
WVDP-RFI-016	"Sealed Rooms Paper Characterization, " Revision 1, dated June 6, 1994

Attachment A

Rooms/Cells Considered for
Additional Decontamination within the Main Plant Building

Product Purification Cell

Extraction Cell 2

Off-Gas Cell

Head End Ventilation

Sample Cell

Equipment Decontamination Room

Upper and Lower Warm Aisle Pump Niches

Off-Gas Blower Room

Ventilation Wash Room

Hot Acid Cell

Solvent Storage Terrace and
Acid Handling Area

Cell Access Aisle

Master Salve Manipulator Repair Shop

Old Main Plant Control Room

01-14 Off-Gas Treatment/Acid
Recovery

Upper Extraction Aisle

Extraction Chemical Room

Switch Gear Room

CPC Viewing Aisle

Central Alarm Station

Chemical Process Cell/EDR Recess

Extraction Cell 1

Acid Recovery Cell

Liquid Waste Cell

Hot Cells (1-5)

Sample Storage Cell

General Crane Room

Chemical Crane Room

Manipulator Repair Room

Process Sample Cells 1 thru 3

Ram Equipment Room

Ventilation Supply Room

Extraction Access Aisle

Analytical and Process Chemistry Labs

Mechanical Operating Aisle

Process Chemical Room

Chemical Process Operating Aisle

Lower Extraction Aisle

Utility Room and Expansion

Analytical Aisle

North Analytical Aisle

DW:2002:0540

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